

Application No.: 09/680,156

Attorney Docket No.: EMC2-080PUS

**REMARKS/ARGUMENTS**

Reconsideration and re-examination are hereby requested.

Claims 1-7 stand rejected under 35 USC 103 (a) as being unpatentable over Nakayama et al (U. S. Patent No. 5,920,893) in view of Thor (U. S. Patent No. 5,448,564) in view further of U. S. Patent No. 6,570,887 (Mehta et al.)

The Examiner appears to indicate that Thor teaches transmitting messages through a messaging network with such messages by-passing cache memory and refers to elements 46 and 60. Applicant fails to see how these elements are networks. More particularly, the system the applicant claims includes;

1. A memory for passing data between the plurality of first directors and second directors through such memory, such memory being coupled to the plurality of first directors and second directors;

2. A messaging network for passing messages between the plurality of directors to control the data passing through the memory, such network being coupled to the plurality of directors. These messages pass through a NETWORK coupled to the all the directors and by-pass the cache memory. The messaging NETWORK passes messages therethrough, such NETWORK being coupled to the plurality of first directors and the plurality of second directors, such first and second directors controlling data transfer between the host computer and the bank of disk drives in response to the messages passing between the directors through the messaging network as such data passes through the cache memory.

It is respectfully submitted that there is no such network/cache memory arrangement is described or suggested in the references cited above. It is respectfully submitted that neither one of the items elements 46 and 60 in Thor is a network coupled to the plurality of directors coupled to the plurality of directors for passing messages let alone by-passing a memory also coupled to the plurality of directors. It is respectfully submitted that none of the references cited above describes or suggests having "messages by-pass a "cache memory" coupled to a plurality of directors as set forth in the claims. There is no recognition in the references cited above to have data passes through the cache memory and the message pass through a messaging network coupled to the directors with the messages by-passing a "cache

Application No.: 09/680,156

Attorney Docket No.: EMC2-080PUS

memory" coupled to a plurality of directors and the message as set forth in the claims.

**Referring now to the claims:**

Claim 1 points out that

a data transfer section having a cache memory coupled to the plurality of first directors and second directors;

a messaging network is coupled to the plurality of first directors and the plurality of second directors, such first and second directors controlling data transfer between the host computer and the bank of disk drives in response to messages passing between the directors through the messaging network as such data passes through the data transfer section;

transmitting such one of the messages to said receiving one, or ones, of the directors through the messaging network with such one of the messages by-passing the cache memory of the data transfer section; and

determining in such receiving one, or ones, the receiving directors whether the received one of the messages is from a proper, or an improper TRANSMITTING one of the directors.

It is respectfully submitted that neither cited reference taken singly or in combination suggest transmitting such one of messages used to control data transfer between the host computer and the bank of disk drives in response to messages passing between the directors through the messaging network with such one of the messages by-passing the cacache memory of the data transfer section in a system where the data transfer section is coupled to the plurality of first directors and second directors. Applicant fails to see any such network and message by-passing, as set forth in the claim, in Thor.

Claim 3 points out that the method includes:

passing data between the plurality of first directors and second directors through a cache memory coupled to the plurality of first directors and second directors;

passing messages through a messaging network coupled to the plurality of first directors and the plurality of second directors, such first and second directors controlling

Application No.: 09/680,156

Attorney Docket No.: EMC2-080PUS

data transfer between the host computer and the bank of disk drives in response to the messages passing between the directors through the messaging network as such data passes through cache memory.

transmitting such one of the messages to said receiving one, or ones, of the directors through the messaging network with such one of the messages by-passing the cache memory, and

determining in such receiving one, or ones, the receiving directors whether the received one of the messages is from a proper, or an improper TRANSMITTING one of the directors.

It is respectfully submitted that such method including controlling data transfer between the host computer and the bank of disk drives in response to the messages passing between the directors through a messaging network as such data passes through a cache memory coupled to the plurality of first directors and second directors with the messages by-passing the cache memory is not described or suggested in any of the references cited above taken either singly or in combination. The separation between the messages which pass through the messaging network to the directors and by-pass the data transfer section from the data which such messages control as such data passes through the cache memory is not suggested or recognized in any of the references cited above. Applicant fails to see any such network and message by-passing, as set forth in the claim, in Thor.

Claim 6 points out that the messaging network is a packet switching network having a plurality of ports, each one of the ports being connected to a corresponding one of the plurality of first and second directors and wherein the messages pass to and from the ports. Applicant fails to see this in the references cited above.

Claims 1, 2 and 7 stand rejected under 35 USC 103 (a) as being unpatentable over Nakayama et al (U. S. Patent No. 5,920,893) in view of Gudaitis et al. (U. S. Patent No. 4,688,168) in view further of U. S. Patent No. 6,570,887 (Mehta et al.)

The Examiner states that Gudaitis teaches transmitting one of the messages through a message network with such messages by-passing a data transfer section.

Application No.: 09/680,156

Attorney Docket No.: EMC2-080PUS

Claim 1 points out that the data transfer section has a cache memory coupled to the plurality of first directors and second directors and that the method includes transmitting such one of the messages to said receiving one, or ones, of the directors through the messaging network with such one of the messages by-passing the cache memory of the data transfer section. Applicant fails to see in Gudaitis a data transfer section having a cache memory coupled to the plurality of first directors and second directors and that the method includes transmitting such one of the messages to said receiving one, or ones, of the directors through the messaging network with such one of the messages by-passing the cache memory of the data transfer section.

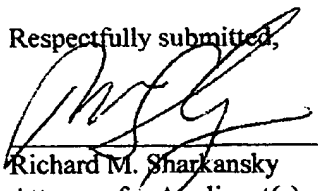
It is respectfully submitted that Gudaitis does not describe or suggest a network coupled to the plurality of directors coupled to the plurality of directors for passing messages which by-passing a memory also coupled to the plurality of directors. It is respectfully submitted that none of the references cited above describes or suggests having "messages by-pass a "cache memory" coupled to a plurality of directors as set forth in the claims. There is no recognition in the references cited above to have data passes through the cache memory and the message pass through a messaging network coupled to the directors with the messages by-passing a "cache memory" coupled to a plurality of directors and the message as set forth in the claims.

In the event any additional fee is required, please charge such amount to Patent and Trademark Office Deposit Account No. 05-0889.

Date

2-14-2005

Respectfully submitted,

  
Richard M. Sharkansky  
Attorney for Applicant(s)

Reg. No.: 25,800

P. O. Box 557

Mashpee, MA 02649

Telephone: (508) 477-4311

Facsimile: (508) 477-7234